

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Olga M. Dunigan	:	
	:	Chapter 13
	:	
	:	
Debtor	:	No.: 16-16442JKF

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY PHH MORTGAGE CORPORATION

COMES NOW, Debtor, Olga M. Dunigan, hereinafter referred to as “Debtor,” by and through her undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by PHH Mortgage Corporation, “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
5. Denied.
6. Denied.
7. Denied. By way of further response, Debtor made post-petition payments in the amounts of \$881.26 on December 13, 2018, \$400.00 on February 1st, 2019, and \$2,643.78 on February 26th, 2019. Lastly, Debtor requests a post-petition mortgage payment history.
8. Denied.
9. Denied.
10. Denied.
11. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: March 25, 2019

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
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